



# Fact Sheet

## Industrial General Permit Renewal

### *Changes to Permit Renewal from the 2011 Draft Include:*

- No numeric effluent limitations; only numeric action levels are retained.
- Prior permit inspection frequency retained to reduce costs.
- Training required similar to approach in the Construction General Storm Water Permit but more customized to industrial community.
- Compliance groups now restore some of the functionality of older, "group monitoring" program.

### History of Storm Water Regulation

Storm water and urban runoff are significant sources of water pollution and can threaten aquatic life and public health. The debris and pollutants carried by storm water into surface waters that the public uses for recreation, drinking, agriculture and other uses is significant. Storm water pollution is caused by the daily activity of people everywhere. It results from activities associated with daily urban life, construction practices and industrial operations, making it the most common cause of water pollution. For nearly two decades, the State Water Resources Control Board (State Water Board) has regulated the runoff and treatment of storm water from industrial, construction and municipal sources in California. The State Water Board is required to issue permits that are consistent with the National Pollutant Discharge Elimination System (NPDES) storm water regulations adopted by the US Environmental Protection Agency (US EPA) in accordance with the federal Clean Water Act.

### Industrial General Permit Renewal

The Industrial General Permit (IGP) is a statewide, general NPDES permit that regulates the discharge of storm water associated with industrial activity as defined by the US EPA.

### Background of the Industrial General Permit

The management of storm water at industrial sites is currently regulated under a permit issued in 1997. This permit should have been reissued in 2002, but its update was delayed in response to debates over how to update the permit and to allow an expert panel to advise the State Water Board on the role of numeric effluent limitations (NELs) in storm water permits. The most recent effort to reissue the IGP began with a draft release in January 2011 and a public hearing in March 2011, that was followed with outreach to industry, environmental non-governmental organizations, property owners, trade associations and others. Approximately 25 meetings were held with stakeholder groups to solicit detailed input. As a result, the State Water Board received more than 2,000 individual comments contained in more than 250



comment letters. The majority of the comments centered on the issues of “costs” and the “role of numerics” in the 2011 draft IGP. This revised draft IGP (released July 2012) proposes the following significant changes:

## Summary of Changes from the 2011 draft Industrial General Permit (IGP)

- **Role of Numerics** – NELs, proposed as part of the Exceedance Response Action System, are removed. Numeric action levels (NALs) that give industry guidance on how to respond with corrective actions to various amounts of pollution that leaves their facility via storm water are retained. NALs also give the Water Boards feedback on the overall performance of the program.
- **Costs** – Many of the specific requirements stated to be overly costly have been removed. For example, the number of inspections required has been reduced to essentially the same levels currently in the 1997 IGP. A detailed cost analysis of the proposed new requirements has also been prepared.
- **Training** – The revised draft IGP retains the role and function of a trained person for each facility, though the term, Qualified Industrial Stormwater Practitioner (QISP), and three levels of QISP are adjusted in this draft to better address the needs of the industrial community. This approach is being used successfully in the recently adopted Construction Storm Water Permit. The training will be implemented via the State Water Board's longstanding partnership with the California Stormwater Quality Association (CASQA). The three levels correspond to the compliance requirements (and costs) associated with different types of facilities. Level 1 is for simple, smaller facilities, while the higher levels relate to facilities and requirements demanding more detailed knowledge and background.
- **Group Monitoring** – While Group monitoring, as defined in Order No. 97-03-DWQ, remains out of the draft, a "compliance group" program was added that provides some of the functions and benefits of the older program. The new program aims to not only provide discharger benefits but to empower the groups to be part of the overall collection and analysis of the information needed for the State Water Board to improve the permit next reissuance.

## Next Steps

The comment period will close September 21. Two staff workshops are set for August 8 and August 10 during this comment period to ensure interested parties have an opportunity to ask questions or seek clarification on the revised draft IGP. There will be a formal public hearing set for October 17 where additional oral comments will be accepted. Following the close of the comment period, public comments will be reviewed to determine if further changes need to be considered to the draft IGP. At the conclusion of this comprehensive effort to solicit feedback on the revised draft IGP, the State Water Board has tentatively scheduled a final adoption hearing for early 2013.

**The 2012 Draft NPDES Industrial General Permit and associated documents may be viewed and downloaded from the State Water Board's website at:**

[http://www.waterboards.ca.gov/water\\_issues/programs/stormwater/industrial.shtml](http://www.waterboards.ca.gov/water_issues/programs/stormwater/industrial.shtml)

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